



OPERATING STANDARDS SECURITY AND SURVEILLANCE EFFECTIVE DATE: NOVEMBER 1, 2023

OVERVIEW

Each Video Lottery Sales Agent (VLSA) shall submit proposed security and surveillance plans, policies, and procedures for video lottery gaming activities at such time as requested by the Ohio Lottery Commission (OLC) Director or prior to commencement of video lottery gaming activities.

REFERENCE DOCUMENTS

Ohio Administrative Code [3770:2-6-03](#)
Video Lottery Sales Agent Terms and Conditions
Ohio Lottery Minimum Internal Control Standards
Ohio Lottery Cybersecurity Operating Standards
Ohio Public Record Law and Security Infrastructure Exceptions [ORC 149.433](#)

STANDARDS AND COMPLIANCE

Security and Surveillance Plans, Policies, and Procedures

VLSA security and surveillance plans, policies, and procedures are exempt from the public records act under section 149.433 of the Ohio Revised Code.

Security and surveillance plans, policies, and procedures must be submitted to the OLC Regulators and the OLC Investigations and Security Department for approval and must address the following:

Surveillance Monitoring Systems

- Any area where any portion of the operation of video lottery occurs including, but not limited to, areas where video lottery terminals (VLTs) and related parts are stored, must be under constant surveillance.
- Where audio will be used/recorded, signs must be posted to notify patrons.
- Surveillance is to conduct independent investigations and reviews. Surveillance personnel are not permitted to work remotely.
- The surveillance system must be capable of identifying conduct related to or involving video lottery including, but not limited to, video lottery participants, the pressing of bet buttons, and video lottery terminal screens. Any such review remains the property of the VLSA.
- All video recordings must be retained for a period of at least fourteen days. Video recordings retained for evidentiary purposes shall require a retention period determined by the OLC.
- The office assigned to on-site OLC Investigators shall be equipped with surveillance monitoring equipment configured with priority one control. The OLC retains the right to access, view, use all cameras, and view all recorded video on the surveillance system and/or other storage devices or locations. Video reviewed remains the property of the VLSA.
- The VLSA must maintain a log that documents the details of system failures, malfunctions, and repairs of the surveillance system including alternative security measures that were taken. The log must be retained for a minimum of one year.
- Plans must include surveillance system data security and data loss prevention procedures.



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- Surveillance system access controls must comply with OLC IT MICS access requirements.
- The surveillance plan must include training for use of the system for the OLC Investigations and Security Department.
- Changes to the gaming floor configuration will require verification of appropriate camera coverage by OLC Investigators prior to the VLTs being made available for play. The OLC may require changes or modifications to the gaming floor, VLTs, or camera views as needed.
- The VLSA must notify OLC Investigators of changes to the surveillance system camera coverage in all areas of the VLSA property covered by the system. The OLC may require modifications to camera coverage in all areas that are determined to be an increased security risk due to insufficient camera coverage.

Data Security

- The VLSA security plan must include policies and procedures for protecting sensitive data.
- The VLSA shall comply with the Ohio Lottery Cybersecurity Operating Standard.

Radio Communications

- The VLSA must provide equipment to the OLC investigators to monitor radio traffic. Equipment must be capable of receive all frequencies.
- VLSA staff are to call the OLC on-duty Investigator cell phone for service day or night, seven days a week.

Security Personnel

- A visible presence of security is required any time the VLSA is open for business or closed while VLTs are stored on property. Plans must address staffing at entrances and exits and a roving security presence at times video lottery is being conducted.
- Security personnel must be clearly identifiable to VLSA guests with regard to their uniform or other uniquely distinguishing wardrobe to be differentiated from other VLSA team members.
- A policy and procedure on age verification to include prohibiting play for individuals less than twenty-one years of age.
- A policy and procedure on monitoring individuals less than twenty-one years of age. The VLSA must demonstrate active control over these individuals while traversing the gaming floor to prevent loitering or stopping while enroute to age allowable venues such as the racetrack, entertainment, or restaurants.
- A plan for interaction with local law enforcement to manage unruly or intoxicated patrons, trespassers, as well as the investigation of other criminal acts that may occur on property.
- A plan for enforcement of Ohio voluntary exclusion violations, self-exclusion, trespass, and banned patron issues.

Security Incident Management Systems

- The VLSA must describe the system for documenting incidents on the gaming floor and the documentation and reporting of all OLC violations.
- The OLC must have access to review entries, logs, reports, and attachments. Any document reviewed remains the property of the VLSA and is not generated by or for the OLC.



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Access Control

- Access to restricted areas must be monitored and limited to appropriate staff.
 - All VLSAs must maintain a log of corporate employees who visit the property but do not possess a valid OLC issued license.
 - State and local regulatory authorities other than OLC Regulators and OLC Investigators shall be treated as third party visitors.
 - Third party visitors accessing restricted areas must register with property security personnel.
- Access must be controlled by a credentialing access card system.
- A system must be utilized for sensitive key control for VLTs and restricted areas including a system that will log the removal and return of sensitive keys. When applicable, procedures must comply with the OLC VLT MICS.
- The VLSA shall describe the name badges or other credentials used to identify their staff and level of access.
- A policy and procedure for controlling access to the surveillance area, review room, and monitor room.
- A policy and procedure for controlling access to stored VLTs and related parts.

Disaster Planning

- There must be an emergency procedures plan detailing the actions the VLSA will take during a major emergency or natural disaster or other event that interrupts business operations or endangers life or safety. OLC Investigators will be granted access to the Emergency Command Center and executive leadership.

Active Aggressor/ Mass Casualty Incident

- An Active Shooter is defined by the Department of Homeland Security as an individual actively engaged in killing or attempting to kill people in a confined and populated area. The immediate deployment of law enforcement is required to stop the shooting and mitigate harm to victims.
- This policy should address:
 - The VLSA's procedure for contacting local law enforcement.
 - The VLSA must provide annual training for all personnel on how they should respond to an active shooter event.

Staffing

- A description of all Gaming or Key Gaming job duties of any VLSA employee must be submitted to the OLC for review and classification. Non-Gaming licensed personnel will not have access to or responsibility for any Gaming or Key Gaming duties.
- Employees may be required to identify themselves to OLC Investigators.

Reporting Requirements:

- Any VLSA employee may make appropriate notification(s) to the OLC and should not be prevented or discouraged from doing so by other VLSA or corporate employees.
- VLSAs may be required to report incidents and other activities as directed by the OLC.



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APPROVAL AND VERIFICATION

The security and surveillance plans, policies, and procedures shall be reviewed, and items of concern will be brought to the attention of the VLSA for correction. The OLC may conduct compliance reviews of the security and surveillance plans, policies, and procedures. The plans, policies, and procedures shall be reviewed and updated by the VLSA as situations dictate, but no less frequently than annually.

CONTACT

Questions regarding minimum internal controls, compliance reviews, and ongoing audits may be directed to: vlt@lottery.ohio.gov